IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF INDIANA LAFAYETTE DIVISION

MARY DOE and NANCY ROE,)	
Plaintiffs)	
v.) Cause No. 4:18-cv-00089-JF	EΜ
PURDUE UNIVERSITY and ALYSSA ROLLOCK and KATIE SERMERSHEIM, in their official and)))	
Defendants)	
Defendants.)	

PLAINTIFFS' MOTION FOR LEAVE TO PROCEED USING PSEUDONYMS

Plaintiffs Mary Doe and Nancy Roe request an Order permitting them to proceed using pseudonyms and to limit disclosure of their true identities pursuant to a forthcoming protective order that appropriately protects disclosure of the Plaintiffs' identities from the public, the terms of which will be negotiated with Defendants. In support of their Motion, the Plaintiffs state the following:

- 1. Plaintiff Mary Doe was a freshman student at Purdue University from August 2017 until she was suspended on February 22, 2018.
- 2. Plaintiff Nancy Roe was a junior student at Purdue University until she was suspended on October 17, 2017.
- 3. Both Plaintiffs have filed a Complaint in this Court requesting damages and other appropriate relief as a result of the Defendants' response to internal complaints each made regarding assault.

USDC IN/ND case 4:18-cv-00089-JEM document 22 filed 03/14/19 page 2 of 3

4. The Plaintiffs incorporate by reference the accompanying Memorandum of Law

and the Declarations attached to this Motion as Exhibits 1–2.

5. The Plaintiffs' litigation concerns sensitive and highly personal matters—namely

intimate partner assault and sexual assault that occurred when both were under twenty-one years

old. These issues are the paradigmatic examples of private issues that warrant a grant of anonymity.

6. As students and young adults, the Plaintiffs are at risk of, and highly susceptible to,

harassment and other harms from their peers, the University community, future employers, and

the public at large if their identities and the details of their assaults and/or their allegations are

made public.

7. Rather than requesting complete anonymity, the Plaintiffs are prepared to stipulate

to a protective order with Defendants that would appropriately protect disclosure of their identities

from the public.

8. In sum, neither Defendants nor the public will be prejudiced if the Plaintiffs are

permitted to proceed pseudonymously, but disclosure of the Plaintiffs' identities constitutes an

extreme intrusion on the Plaintiffs' privacy and places them at risk of harassment.

Respectfully submitted,

MACEY SWANSON LLP

/s/Jeffrey A. Macey

Jeffrey A. Macey, Atty No. 28378-49

Attorney for Plaintiffs

MACEY SWANSON LLP

445 North Pennsylvania Street

Suite 401

Indianapolis, IN 46204-1800 Telephone: (317)637-2345

Facsimile: (317)637-2369

E-Mail: jmacey@maceylaw.com

2

CERTIFICATE OF SERVICE

The undersigned certifies that on March 14, 2019, a copy of the foregoing was served via operation of the Court's electronic filing system on all Counsel of Record.

Respectfully submitted,

/s/ Jeffrey A. Macey
Jeffrey A. Macey, Atty No. 28378-49
Attorney for Plaintiffs

MACEY SWANSON LLP

445 North Pennsylvania Street Suite 401 Indianapolis, IN 46204-1800 Telephone: (317)637-2345

Facsimile: (317)637-2369

E-Mail: jmacey@maceylaw.com